

22cv10957

7/22/25

Ali Moore

UNITED STATES DISTRICT COURT

[Your District Here]

[Division, if applicable]

[Plaintiff Name],

Plaintiff,

v. Case No. [22cv10957]

[Defendant Name],

Defendant.

PLAINTIFF'S MOTION TO STAY PROCEEDINGS

Plaintiff, by and through undersigned counsel, respectfully moves this Court to order a stay of proceedings in the above-captioned matter, and in support thereof, states as follows:

INTRODUCTION AND RELIEF REQUESTED

Plaintiff respectfully requests that the Court issue an order staying all proceedings in this case pending [state reason, e.g., the resolution of related litigation, anticipated settlement negotiations, a pending appeal in a related matter, ongoing agency action, etc.]. This stay should include, but not be limited to, suspension of all discovery, deadlines for filing pleadings, and pretrial or scheduling conferences, until further order of the Court.

FACTUAL BACKGROUND

- On [date], Plaintiff filed the complaint alleging [cause(s) of action].
- On [date], circumstances arose that warrant a stay of proceedings. Specifically, [describe the changed circumstance—for example, the parties have commenced meaningful settlement negotiations, an appeal in a related matter may impact the current proceedings, another case outcome is likely to moot or clarify issues here, etc.].

LEGAL ARGUMENT

When deciding whether to grant a stay, courts commonly consider:

1. Likelihood of success on the merits of the underlying matter that may affect this case;
2. Irreparable harm to the movant if the stay is not granted;

In this case, these factors weigh in favor of a stay because [articulate briefly how stay is warranted, e.g., there is a high likelihood that resolution of the other matter will affect or dispose of issues in this case, continuing litigation now would result in unnecessary expense or inconsistent outcomes, the parties are actively attempting to resolve the matter amicably, etc.].

CONCLUSION

For these reasons, Plaintiff respectfully requests that the Court enter an order staying all proceedings in this action until [condition is met, e.g., the resolution of the related action,

completion of settlement talks, resolution of the appeal, etc.], and granting such further relief as the Court deems just and proper.

Dated: [Date]

Respectfully submitted,

[Signature of Plaintiff's Attorney]

[Printed Name]

[Bar Number]

[Firm Name, if any]

[Address]

[City, State, Zip]

[Email Address]

[Phone Number]

[Attorney for Plaintiff]